

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

TOMMY NGUYEN, PAULUS NIEKDAM,	)	
and LOC TRAN, Individually and on	)	
Behalf of All Others Similarly Situated,	)	
Plaintiffs,	)	
	)	No. 3:13-cv-04689-D
vs.	)	
	)	
VERSACOM, LLC, MUHAMMAD AL-AMIN,	)	
Individually, and AFREEN AL-AMIN,	)	
Individually,	)	
Defendants.	)	

**JOINT STATUS REPORT**

The parties file this Joint Report as directed in the Court's Order on Fed. R. Civ. P. 37(A)(5) Award of Expenses dated February 29, 2016 (Doc. 173), and respectfully state:

1. Plaintiffs' counsel and Defendants' counsel met face to face on March 17, 2016 and conferred on the reasonable amount of attorneys' fees and costs to be awarded by the Court<sup>1</sup>;
2. Plaintiffs' and Defendants' counsel agreed that \$6,948.48 (26.94 hours) is a reasonable amount incurred by Plaintiffs given the parameters of the attorneys' fees and costs awarded by Judge Horan in the Order On Fed. R. Civ. P. 37(A)(5) Award Of Expenses (Doc.173);
3. Plaintiffs' and Defendants' counsel also agreed that attorneys' fees and costs (\$6,948.48) have been adjusted to exclude any attorneys' fees or costs that Plaintiffs incurred in connection with Requests for Production Nos. 1, 2, 9, and 11 or that Plaintiffs incurred prior to the extended deadlines for Defendants to serve objections and responses to Plaintiffs' First Requests for Production, including in connection with Plaintiffs' counsel's preparing and propounding the

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<sup>1</sup> Prior to face to face meeting, Plaintiffs' counsel provided Defendants' counsel with detailed billing entries evidencing the number of hours and amount of fees and costs incurred in connection with their Motion to Compel.

discovery requests at issue.

Respectfully submitted,

By: /s/ Antonio U. Allen

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**ATTORNEYS FOR PLAINTIFFS**

And

By: /s/ Colin Durham

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel and parties of record by electronic service in accordance with the local rules of United States District Court for the Northern District of Texas, Dallas Division this 21<sup>st</sup> day of March, 2016.

/s/ Antonio U. Allen